

NORTON ROSE FULBRIGHT

May 7, 2015

VIA ECF AND FACSIMILE

The Honorable George B. Daniels
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Norton Rose Fulbright US LLP
666 Fifth Avenue, 31st Floor
New York, New York 10103-3198
United States

Bill Leone
Partner
Direct line +1 212 318 3324
william.leone@nortonrosefulbright.com

Tel +1 212 318 3000
Fax +1 212 318 3400
nortonrosefulbright.com

Re: *SEC v. Javier Martin-Artajo and Julien Grout*, Case No. 13-Civ-5677 (GBD) (MD)

Dear Judge Daniels:

We represent defendant Javier Martin-Artajo. Enclosed herewith is a proposed amended Civil Case Management Plan and Scheduling Order for the Court's consideration, consistent with our letter to the Court dated May 1, 2015. We have circulated the proposed Order to counsel for the parties.

We look forward to discussing our proposed Order and the other matters on the agenda at tomorrow's conference.

Respectfully submitted,

Bill Leone /po

Bill Leone

WJL

cc: All Counsel of Record